FAX NO. (717) 632-4902



Hanover, PA, 17331

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July 28, 1988

Michael Towle
Remedial Enforcement Project Officer
U.S. Environmental Protection Agency, Region III
PA CERCLA Remedial Enforcement Section (3HW12)
P.O. Box 3409
Reston, VA 22091

RE: KEYSTONE SANITATION LANDFILL ADAMS COUNTY, PENNSYLVANIA

Dear Mr. Towle:

This will acknowledge receipt of a letter dated June 28, 1988, addressed to John W. Swope, President of Tim-Bar Corporation (hereinafter "Tim-Bar", from Bruce P. Smith, Chief Hazardous Branch, U.S. Environmental Protection Agency). This letter, of course, relates to the Keystone Sanitation Landfill in Adams County, Pennsylvania, and requests information regarding any contact that Tim-Bar may have had with said landfill. Mr. Swope has asked me to respond to the request. The following will hopefully contain the information needed to complete your investigation.

- 1. Tim-Bar is a non-operating holding company. It owns all or part of several corporations doing business in the eastern United States. Various administrative functions, including accounting, banking, etc., are performed by Tim-Bar on behalf of its subsidiaries.
- 2. Tim-Bar operates from 8:30 a.m. to 5:00 p.m. Monday through Friday (excepting legal holidays).
- 3. Attached hereto and incorporated herein as Exhibit "A" is a flow chart identifying Tim-Bar subsidiary corporations.
- 4. Tim-Bar is not engaged in manufacturing, maintenance or related processes.
- 5. Tim-Bar does not use or generate raw materials, products or wastes in connection with its business operations.

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Remedial Enforcement Project Officer
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- 6. Not applicable. Tim-Bar does not handle potentially hazardous substances and, therefore, has no procedure for preventing the mixture of such substances with non-hazardous waste streams.
- 7. Although certain subsidiary corporations of Tim-Bar may have contracted with the Keystone Sanitation Landfill from time to time, Tim-Bar itself did not contract with the Keystone Sanitation Landfill. All subsidiaries that contracted with the Keystone Sanitation Landfill have been previously identified to the EPA.
- 8. Not applicable. Tim-Bar did not dispose of wastes at the Keystone Sanitation Landfill.
- 9. Not applicable. Tim-Bar had no arrangement with any hauler or transporter of waste products.
- 10. None. Tim-Bar does not and has not used, treated, transported, disposed of or handles hazardous substances.
 - 11. None. See answer to Question 9.
- 12. None. Tim-Bar has no permits, applications or correspondence from any regulatory agency regarding transport or disposal of hazardous wastes.
- 13. None. Tim-Bar has no direct knowledge of any person who generated, treated, stored, transported or disposed of hazardous substances to the Keystone Sanitation Landfill site.

As to liability insurance for hazardous waste disposal, Tim-Bar maintains an umbrella insurance policy that insures against some aspects of hazardous waste disposal for Tim-Bar and its subsidiaries. The exact nature of the coverage is less than clear and may become the subject of litigation.

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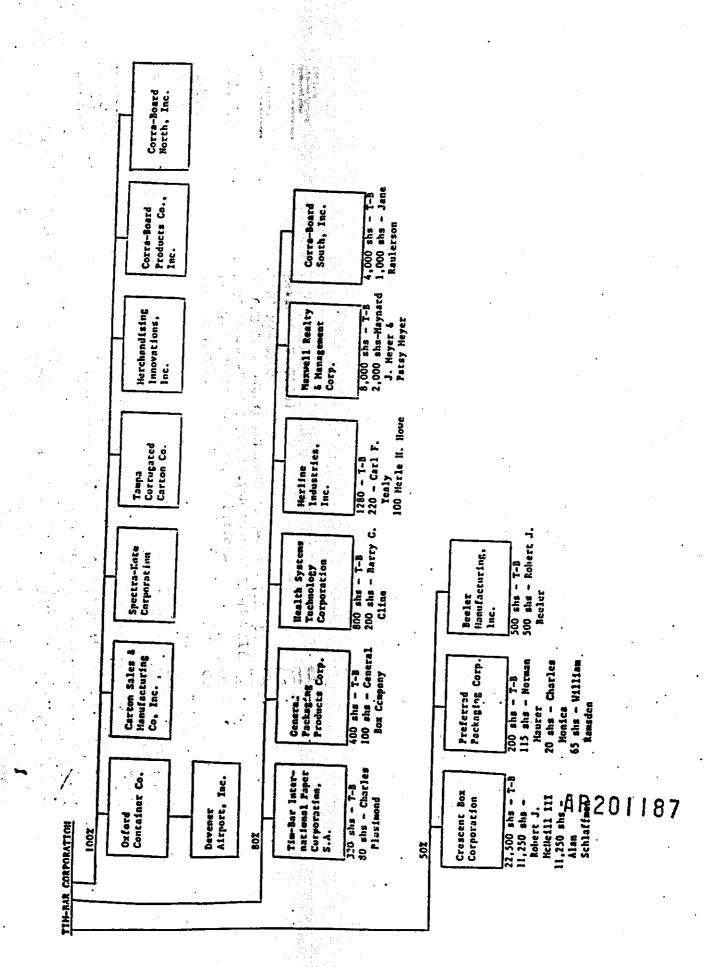
If any additional information is required to complete your investigation, please do not hesitate to contact the undersigned.

Very truly your

TIM-BAR CORPORATION

Larry B. Cottrill, Claims

cc: John W. Swope, President



148 North Penn Sti P.O. Box 449 Hanover, PA, 173. CORPORATION

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2ND Notice Return

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